

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C. 20554**

In the Matter of)	RM-11626
)	
Request for Licensing Freezes and Petition for)	
Rulemaking to Amend the Commission's DTV)	
Table of Allocations to Prohibit the Future)	
Licensing of Channel 51 Broadcast Stations and to)	
Promote Voluntary Agreement to Relocate)	
Broadcast Stations from Channel 51)	
)	

To: The Secretary

Comments

Chambers Communications Corp. ("Chambers") owner of (1) Three Sisters Broadcasting, LLC the licensee of full-power Station KOHD-DT, Channel 51, Bend, Oregon, and (2) Soda Mountain Broadcasting, Inc., Licensee of K51BV-D, Translator in Cave Junction, Oregon hereby files these comments in opposition to the Petition for Rulemaking captioned above ("Petition").

Petitioners request for **Licensing Freezes and Petition for Rulemaking to Amend the Commission's DTV Table of Allotments** unfairly requires the Broadcasters to shoulder the burden of what Petitioners have long known or should have known. The Commission's Policies have been and continue to be to protect existing licensees from interference and was indeed made clear prior to the Auctions 73 & 76 by rule 27.60. This criteria should have been considered by petitioners prior to auction in determining the value of the A Block to their needs and likely affected the price they paid at auction for their authorizations. Why should the Broadcasters having given back Ch 52 through 69 now be asked to provide the buffer guard band in addition to the lost channels? Additionally, changing boats in the middle of the stream costs the public in lost revenue

at the excuse of we can't build due to the unknowns presented by Broadcast Rules that existed at the time of auction?

Petitioners do not address the fact that a guard band at the low end of Channel 52 coupled with the tight mask filter requirements for Full Service Broadcasters might very well create the "buffer" needed to allay their fears. They simply ask the Commission to further burden Broadcasters and the Public for what might be, not what is actually known without any definitive results or tests and ask the Commission to rule fast track on "What ifs". How does that fairly address the Public Interest needs for access to free over the air Broadcasts as well as increased Wireless connectivity as envisioned in the original Auction parameters and payments?

The Petitioners do not address another issue raised by their request. The 6 Mhz left by Ch 51 vacates should not be re-assigned at a future time to any service incompatible with Ch 50 assignments in the Full Service Broadcast or LPTV Translator services, thus leaving an unresolved issue: How do we not waste another 6 Mhz of spectrum and create exactly the same problem ad-infinitum?

Should the Commission grant the Petitioner's request it should require all costs of relocation to be paid by the Block A permittee. This should include the costs of any other LPTV or Translator station further displaced by the Full Service Channel 51 re-assignment. In conjunction with reimbursements, the Commission should provide expedited process to modify the table of allotments for all such displaced Full Service Stations and expedited processing of all applications for displacement by LPTV and Translator stations affected by such Full Service CH 51 relocations.

Chambers urges that the Commission reject Petitioners proposals, maintain Ch 51 Broadcast Spectrum in its present form and require A Block licensees to build as required by their terms of authorization.

Respectfully Submitted,

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